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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LATONIA SMITH,

Plaintiff(s),

-VS-

CAESARS ENTERTAINMENT  
CORPORATION, a Delaware corporation;  
PHWL, LLC d/b/a PLANET  
HOLLYWOOD RESORT AND CASINO, a  
Nevada limited liability company;  
SHANNON PIERCE; ETHAN THOMAS,

Defendant(s).

Case No.: 2:19-cv-00856-GMN-NJK

**DEFENDANT SHANNON PIERCE'S  
RESPONSE TO PLAINTIFF'S  
MOTION TO EXPEDITE HEARING  
ON PLAINTIFF'S MOTION TO  
REMAND/EXTRADITE ACTION TO  
STATE COURT**

Defendant Shannon Pierce ("Ms. Pierce"), by and through her counsel of record, Snell & Wilmer L.L.P., hereby submits this Response to Plaintiff Latonia Smith's ("Ms. Smith") "Motion to Expedite Hearing on Plaintiff's Motion to Remand/Extradite Action to State Court" [ECF No. 92]. This Response is based upon the following memorandum of points and authorities, the pleadings and papers on file in this action, and any oral arguments the Court may entertain.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Ms. Pierce disagrees with Ms. Smith's position and does not concede the merits of any of her arguments. Ms. Pierce specifically denies using any delay to destroy evidence, and the Court has already found that Ms. Smith's contention in this regard is unsupported by evidence. *See* ECF No. 91.

Given the record currently before this Court, Ms. Pierce does not believe any further substantive response to Ms. Smith's Motion is required. Ms. Pierce simply incorporates the prior briefing regarding the underlying issues, including, but not limited to, her Response to Ms. Smith's Motion to Remand [ECF No. 28] and co-Defendants' Response to Ms. Smith's Motion to Remand [ECF No. 27] as if fully set forth herein.

For these reasons, Ms. Pierce requests that the Court deny Ms. Smith's Motion in its entirety.

Dated: October 29, 2019.

SNELL & WILMER L.L.P.

By: /s/ Michael Paretti

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**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **DEFENDANT SHANNON PIERCE'S RESPONSE TO PLAINTIFF'S MOTION TO EXPEDITE HEARING ON PLAINTIFF'S MOTION TO REMAND/EXTRADITE ACTION TO STATE COURT** by method indicated below:

☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).

☒ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

Latonia Smith (*in Pro Per*)  
9748 Canyon Landing Ave.  
Las Vegas, NV 89166  
Tel: (702) 521-3522

☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

☐ **BY PERSONAL DELIVERY:** by causing personal delivery by \_\_\_\_\_, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.

☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

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*Attorneys for Defendant Caesars Entertainment Corporation, PHWLTV, LLC dba Planet Hollywood Resort & Casino, and Ethan Thomas*

DATED this 29th day of October, 2019.



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An employee of SNELL & WILMER L.L.P.

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